IN THE UNITED STATES DISTRICT COURT EASTERN DISTRICT OF ARKANSAS PINE BLUFF DIVISION

LOUISE KING PLAINTIFF

VS. CASE NO: 5:14-cv-00021-KGB

DAVIS LIFE CARE CENTER

DEFENDANT

PLAINTIFF'S MOTION FOR EXTENSION OF TIME TO RESPOND TO DEFENDANT'S MOTION FOR SUMMARY JUDGMENT

Comes now the Plaintiff by and through her counsel, Teresa Bloodman, and for her motion states:

- 1. That the time for Plaintiff's response to Defendant's motion for summary judgment has not passed.
- 2. Due to the complexity of the issues and the number depositions and exhibits to review and research, the petitioner requests an Extension of Time to respond.
 - 3. That the purpose of this motion is not for any delay.
- 4. That the Plaintiff requests an extension of thirty (30) days to file a response to Defendant's motion for summary judgment.

WHEREFORE, the Plaintiff prays that an extension of thirty (30) days to file a response to Defendant's motion for summary judgment be granted and for all other proper and just relief.

Respectfully submitted,

/s/Teresa Bloodman #2005055 Attorney for Plaintiff P.O. Box 13641 Maumelle, AR 72113 (870) 550-1940 (d) teresabloodman@yahoo.com

CERTIFICATE OF SERVICE

I, Teresa Bloodman, do hereby certify that a true and correct copy of the foregoing pleading was filed, this 12th day of October, 2015, with the Clerk of Court using the ECF electronic filing system and notification of such filing was served electronically to the attorney of record:

Mr. Spence Robinson, Esq. Ramsay, Bridgforth, Robinson and Raley LLP P.O. Box 8509 Pine Bluff, AR 71611-8509 spencerrobinson@ramsaylaw.com

/s/ Teresa Bloodman